

1 ALLEN M. DUTRA, TRUSTEE
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6 **UNITED STATES BANKRUPTCY COURT**
7 **DISTRICT OF NEVADA**

8 IN RE: **CASE NO.BK-N-11-51998**

9 **ARNAUD, RICK J.**

10 **CHAPTER 7**

11 **MOTION AND NOTICE FOR ORDER**
12 **EXTENDING TIME TO OBJECT TO**
13 **THE ENTRY OF THE DISCHARGE**

14 **Negative Notice/No Hearing Required**

15 Debtor(s).
16 _____/

17 **TO THE DEBTOR (S) AND DEBTOR'S COUNSEL:**

18 **PLEASE TAKE NOTICE THAT:** The Trustee in the above-captioned case, Allen M.
19 Dutra, and the Office of the United States Trustee, hereby respectfully requests an extension
20 of time in which to file an objection to Entry of Discharge.

21 **POINTS AND AUTHORITIES**

22 A. **Statement of Relevant Facts:**

23 1. The Debtor(s) commenced this proceeding by filing a voluntary petition under
24 Chapter 7 on June 17, 2011.

25 2. The meeting of creditors in this proceeding, pursuant to 11 U.S.C. Section 341 and
26 Federal Rule of Bankruptcy Procedure 2003(a) was first set on July 28, 2011.

27 **3. The Trustee is investigating non-exempt assets (land).**

28 B. **Objection to the Discharge of the Debtor(s):**

The Trustee is informed and believes that the last day for filing objections to the Discharge
of the Debtor(s) under 11 U.S.C. Section 727 and pursuant to F.R.B.P. 4004 is February 28, 2013
and that a request for an extension of that deadline must be made before said date.

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1 The Trustee believes an extension of the time in which he may object to the Discharge of the
2 Debtor(s) will be necessary. The Trustee therefore requests an extension of the deadline for filing a
3 complaint objection to the Discharge of the Debtor(s) from the deadline for filing objections to the
4 Discharge, **to-wit: August 31, 2013.**

5 **WHEREFORE**, it is respectfully requested that the Court grant an extension of the
6 deadline for filing a complaint objecting to the Discharge of the Debtor(s).

7 **NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING:** Pursuant to
8 **LR 9014.1**, the court will consider this motion, objection, or other matter without further
9 notice of hearing unless a party in interest files an objection within 21 days from the date of
10 service of this paper. If you object to the relief requested in this paper, you may file your
11 objection at the bankruptcy clerk's office located in Reno, at the United States Bankruptcy
12 Court, 300 Booth Street, Reno, Nv. 89509, and serve a copy on the movant's attorney and any
13 other appropriate persons.

14 It is the duty of the objecting party to timely set the objection for a hearing and
15 properly notice all parties in interest. If you do not file an objection within the time
16 permitted, an order granting the requested relief may be entered by the court without further
17 notice or hearing.

18 Respectfully submitted this 25th day of February, 2013.

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21 /s/ Allen M. Dutra
22 **ALLEN M. DUTRA, Trustee**
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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I, Allen M. Dutra, Trustee, 59 Damonte Ranch Parkway, Suite B299 Reno, Nevada 89521, and that on February 25, 2013 I served a true and correct copy of the foregoing **MOTION AND NOTICE FOR ORDER EXTENDING TIME TO OBJECT TO THE ENTRY OF THE DISCHARGE** to the names listed as below:

KENNETH WARD, ESQ.
Via ECF System

OFFICE OF THE UNITED STATES TRUSTEE:
Via ECF System

On the parties and addresses set forth below by placing a true copy thereof for collection and mailing in the United States Mail, at Reno, Nevada, first class mail, postage paid

Rick Arnaud
610 Wedge Lane
Fernley, NV 89408

Dated this 25th day of February, 2013.

/s/ Allen M. Dutra
Allen M. Dutra, Trustee